

# **Exhibit A**

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February 27, 2020

*Via electronic mail*

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Re: *In re Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Counsel:

This letter responds to your letter dated February 25, 2020 regarding the Kingdom of Saudi Arabia's ("Saudi Arabia") production of documents relating to Abdullah Al Jaithen and memorializes the meet and confer call that the parties had on February 27, 2020.

As I stated on the February 27 call, Saudi Arabia has conducted a thorough and reasonable search of the Ministry of Islamic Affairs ("MOIA") for documents responsive to the Court's January 3, 2020 order. Saudi Arabia produced all potentially responsive documents located in that search; no documents were withheld on the basis of privilege. As you are aware, Saudi Arabia has also produced documents that fall outside the relevant period, despite being under no obligation to do so.

As also discussed on the February 27 call, Saudi Arabia is currently conducting a secondary search of MOIA to ensure that all responsive documents have been collected, including documents related to Mr. Jaithen's travel during the December 1999 time period. Any additional responsive documents located during this secondary search will be produced to Plaintiffs. Saudi Arabia also intends to produce from the Ministry of Interior information pertaining to Mr. Jaithen's passport and entry/exit information during the relevant period.

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Plaintiffs stated on the February 27 call that they nonetheless intend to file a motion with the Court. Plaintiffs declined to state what relief they intended to move for nor did they explain the basis for this motion. If Plaintiffs choose to file such a motion, Saudi Arabia will respond appropriately.

Sincerely,

*/s/ Andrew C. Shen*

Andrew C. Shen  
*Counsel for the Kingdom of Saudi Arabia*